ATTACHMENT 31

	Page 1			Page 3
	UNITED STATES DISTRICT COURT	1	APPEARANCES:	
	NORTHERN DISTRICT OF CALIFORNIA	2		
	SAN JOSE DIVISION	3		
		4	ON BEHALF OF THE PLAINTIFF CI	SCO SYSTEMS, INC., and
CIS	SCO SYSTEMS, INC.,	5	the WITNESS:	
	Plaintiff,	6	QUINN EMANUEL URQUHART &	& SULLIVAN LLP
VS.	No. 5:14-cv-05344-BLF(PSG)	7	By: SEAN S. PAK, Esq.	o ocean vin v, een
AR	ISTA NETWORKS, INC.,	8	50 California Street, 22nd Floor	
	Defendant.	9	San Francisco, California 94111	
	/	10	Phone: 415.875.6600	
		11	seanpak@quinnemanuel.com:	
		12	<i>зеапрака</i> диппетаниет.сотт.	
C	ONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER	13		
		14	ON DEHALE OF THE DEFENDANT	ADICTA NETWODIC INC.
	VIDEOTAPED DEPOSITION OF TONG LIU	15	ON BEHALF OF THE DEFENDANT A KEKER & VAN NEST LLP	ARISTA NET WORKS, INC
	FRIDAY, JANUARY 15, 2016			
	PALO ALTO, CALIFORNIA	16	By: RYAN WONG, Esq.	
		17	633 Battery Street	.0
		18	San Francisco, California 94111-180	19
		19	Phone: 415.773.6682	
		20	rwong@kvn.com	
Rep	ported by:	21		
AN	DREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR	22	ALSO PRESENT: Kevin Foor, Videog	rapher
CSI	R LICENSE NO. 9830	23		
JOF	B NO. 2211574	24	oOo	
Pag	ges 1 - 215	25		
	Page 2			Page 4
1	UNITED STATES DISTRICT COURT	1	INDEX	
2	NORTHERN DISTRICT OF CALIFORNIA	2	INDEX	
3	SAN JOSE DIVISION	3	WITNESS: Tong Liu	
4		4	WITNESS. Tolig Liu	
5 CI	ISCO SYSTEMS, INC.,	5	EXAMINATION	PAGE
6	Plaintiff,	6	By Mr. Wong	7, 207
7 vs		7	By Mr. Pak	185
8 Al	RISTA NETWORKS, INC.,	8	By Wil. I ak	103
9	Defendant.	9	EXHIBITS	
	/	10	EXHIBIT	PAGE
10		11		
11		12	Exhibit 92 Amended Exhibit Exhibit 93 IEEE Standard fo	
12		13	Clock Synchronization	
13			for Networked Measu	
14	Videotaped Deposition of Tong Liu, taken on	14		
15	Friday, January 15, 2016, pursuant to notice, on	15	Control Systems, Bat	
16 l	behalf of the Defendants, at 610 Page Mill Road,	16	ARISTANDCA0003	1/33 - 32021;
17]	Palo Alto, California before me, ANDREA M. IGNACIO,	17	289 pgs.	i Ti D. (1.100
18	CSR, RPR, CRR, CCRR, CLR ~ CSR License No. 9830	18	Exhibit 94 IEEE1588 Precis	
19		19	Platform-Independent	
		20	Functional Specificat	
20		21	CSI-CLI-00610555 -	
20		22	Exhibit 95 6-25-08 E-mail, S	
20 21		23	permission for adding	PTP CLI
20 21 22				PTP CLI

1 EXHIBITS (Continued.) 2 way. 2 If there are any objections to pro-	1
	ceeding,
3 EXHIBIT PAGE 3 please state them at the time of your a	
4 Exhibit 96 6-25-08 E-mail, Subject: Seeking 124 4 And if you would please state yo	
5 permission for adding PTP CLI 5 appearances.	
6 commands, Bates CSI-CLI-00608739 6 MR. WONG: Ryan Wong from	Keker & Van Nest
7 - '40; 2 pgs. 7 for defendant Arista Networks.	
8 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 8 MR. PAK: Sean Pak of Quinn E	imanuel.
9 permission for adding PTP CLI 9 representing Cisco and the witness.	
commands, Bates CSI-CLI-00846656 10 THE VIDEOGRAPHER: Thank	(VOII
11 - '57; 2 pgs. 11 If the court reporter would please	•
12 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 12 witness, we can begin.	/ Swear the
13 System Management Command 13 withiess, we can begin.	
14 Reference, Bates CSI-CLI-00194055 14 TONG LIU,	
	10
, 16	
, v	rter,
17oOo 17 testified as follows:	
18 18	
19 PREVIOUSLY MARKED EXHIBITS 19 EXAMINATION	
20 BY MR. WONG:	
Exhibit 53 CLI Design and Review Guide, Bates 21 Q Good morning, Ms. Liu.	
22 CSI-ANI-00073381 - '.000014; 15 pgs. 22 A Good morning.	
23 Q Please state your full name for t	the record.
24 A Tong Liu.	
25 Q Do you go by any other names,	Ms. Liu?
Page 6	Page 8
1 PALO ALTO, CALIFORNIA 1 A At work, I go with Toni.	
FRIDAY, JANUARY 15, 2016 2 Q Could you spell Toni for me,	please.
3 9:32 A.M. 3 A T-O-N-I.	
4 Q Okay. Have you gone by Tor	ni Liu for for
5 what period of time have you gone	by Toni Liu?
6 A That name is only used at wor	rk. It's not an
7 THE VIDEOGRAPHER: Good morning. We are on 7 officially alternative name.	
8 the record at 9:32 on January 15th of the year 2016. 8 Q And besides Toni Liu, have y	ou gone by any
9 This is the video deposition of Tong Liu. 9 other names, Ms. Liu?	
My name is Kevin Foor. I'm here with court 10 A No.	
reporter Andrea Ignacio. And we are here from	
12 Veritext Legal Solutions at the request of Keker &	
13 Van Nest.	
14 This deposition is being held at Wilson	
15 Sonsini Goodrich & Rosati in Palo Alto.	
The caption of the case is Cisco Systems,	
17 Inc., v. Arista Networks. That is case 514-CV-05344	
18 ELF BSG.	
19 Please note that audio and video recording	
20 will take place unless all parties agree to go off the 20 Q Thank you.	
21 record. Microphones are sensitive and may pick up 21 Who is your current employer,	Ms Lin?
who is your current employer, who is your current employer, who is your current employer, and whispers, private conversations, and cell 22 A Aruba Networks.	1710. 1/14:
22 whispers, private conversations, and cen 22 A Artiba Networks. 23 interference. 23 Q Do you have a work address f	for Aruba
	.vi Aiuva
24 I'm not related to any party in this action, 24 Networks?	1
nor am I interested financially in the outcome in any 25 A 1322 Crossman Avenue, Sun	nvvale

	Page 93		Page 95
1		1	
1	MR. WONG: You testified earlier that PTP was	1	Ethernet device, and you worked on implementing that?
2	one of the protocols identified to be interoperative.	2	A Right.
3	Q Were there were you aware of any other	3	Q Okay. And you don't know the reasons behind the decision to add PTP functionality well,
4	protocols that were identified to be interoperative? A I'm not aware of that.	4 5	
5 6	Q Okay. But you were aware that PTP was	6	actually, strike that. So did you see the IEEE PTP standard before
7	identified?	7	you began adding PTP functionality to the Cisco
8	A Right.	8	industrial Ethernet device?
9	Q And do you know which other vendors supported	9	A When you say "before," it's before I started
10	PTP, based upon your team's investigation, before	10	writing code?
11	adding PTP to the industrial Ethernet products?	11	Q Yes.
12	A Siemens is one vendor.	12	A I yes, I read the spec
13	Q Okay. So Siemens supported PTP in its	13	Q Okay.
14	devices before PTP functionality was added to the	14	A for understanding to understand how it
15	Cisco industrial Ethernet devices; correct?	15	works.
16	MR. PAK: Objection; calls for speculation.	16	Q I see.
17	THE WITNESS: I don't know the I don't	17	So you read the and by "the spec," you
18	recall the exact details, but I do remember Siemens	18	mean the IEEE PTP spec?
19	was mentioned in our previous conversations. I mean,	19	A Yes.
20	the was in the team.	20	Q During the break, the court reporter marked
21	MR. WONG: Oh.	21	as Exhibit No. 93 the document right there to your
22	Q Siemens was	22	right.
23	A I	23	MR. WONG: And counsel, here's a copy for you
24	Q Sorry. Go ahead.	24	as well.
25	A Yes, as one important vendor for industrial	25	MR. PAK: Thanks.
	, 1		
	Page 94		Page 96
1	devices.	1	MR. WONG: The document bears control numbers
2	Q And I think you answered this earlier, but	2	AristaNDCA00031733 to '32021.
3	your team did not look at the specifics of how Siemens	3	Q Ms. Liu, you can take your time to look at
4	implemented PTP when you started adding PTP commands	4	the document, but the question that I have for you is:
5	to Cisco's industrial Ethernet devices; correct?	5	Do you recognize this document marked as Exhibit 93?
6	A We didn't look at any other vendor's device	6	A Yes, I I think this is the one we used, as
7	at the time.	7	well as the standard.
8	Q Okay. Have you seen the IEEE PTP standard	8	Q Okay. Can you read the title of the IEEE
9	before?	9	specification marked as Exhibit 93.
10	A "Before" meaning before today or before	10	A "IEEE standard for the precision clock
11	Q Yes, before today.	11	synchronization protocol for network measurement and
12	A Before today, yes.	12	control systems."
13	Q When was the first time that you saw the IEEE	13	Q Okay. And the the I guess the number
14	PTP standard?	14	for the standard on the bottom right is IEEE
15	A That's when I was working on this industrial	15	standard 1588-2008.
16	Ethernet switch development around 2008, I think.	16	Do you see that?
16 17	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry.	16 17	Do you see that? A Yes, uh-huh.
16 17 18	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that.	16 17 18	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we
16 17 18 19	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP	16 17 18 19	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct?
16 17 18 19 20	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device?	16 17 18 19 20	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes.
16 17 18 19 20 21	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device? A It was some decision made, and I was the one	16 17 18 19 20 21	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes. Q Okay. So so the exhibit marked as 93 is
16 17 18 19 20 21	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device? A It was some decision made, and I was the one implementing it.	16 17 18 19 20 21 22	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes. Q Okay. So so the exhibit marked as 93 is the standard that you reviewed before you began coding
16 17 18 19 20 21 22 23	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device? A It was some decision made, and I was the one implementing it. Q I see.	16 17 18 19 20 21 22 23	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes. Q Okay. So so the exhibit marked as 93 is the standard that you reviewed before you began coding the PTP functionality for the Cisco industrial
16 17 18 19 20 21 22 23 24	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device? A It was some decision made, and I was the one implementing it. Q I see. So somebody else at Cisco made the decision	16 17 18 19 20 21 22 23 24	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes. Q Okay. So so the exhibit marked as 93 is the standard that you reviewed before you began coding the PTP functionality for the Cisco industrial Ethernet device; correct?
16 17 18 19 20 21 22 23	Ethernet switch development around 2008, I think. Q Was it your choice to add I'm sorry. Strike that. Was it your suggestion to add PTP functionality to the Cisco industrial Ethernet device? A It was some decision made, and I was the one implementing it. Q I see.	16 17 18 19 20 21 22 23	Do you see that? A Yes, uh-huh. Q And this is the PTP IEEE standard that we have been talking about in this deposition; correct? A Yes. Q Okay. So so the exhibit marked as 93 is the standard that you reviewed before you began coding the PTP functionality for the Cisco industrial

	Page 97		Page 99
1	Q Okay. And did you read the entire standard	1	message.
2	before you began working on the PTP functionality?	2	Q And those are specified in the IEEE PTP
3	A Yeah, I believe I read the the entire	3	standard; right?
4	or the majority part of it.	4	A Yes.
5	Q That's that's impressive.	5	Q And you followed those standards when
6	How the standard is is several hundred	6	implementing the PTP functionality in Cisco's
7	pages long.	7	industrial Ethernet products; right?
8	But you read the whole thing you remember	8	MR. PAK: Objection; vague.
9	reading the whole thing?	9	THE WITNESS: For the messages, yes.
10	A Yes.	10	MR. WONG: Q. And for the field definitions
11	Q Did you consult with the standard marked as	11	as well?
12	Exhibit 93 while you were coding the PTP functionality	12	A The field definition if you mean the
13	for Cisco's industrial Ethernet devices?	13	how wide the field is, which field needs to follow
14	A Yes. All of the messages format, the field	14	which one, yes. But particularly on the name of the
15	definitions behaviors, are documented here.	15	field, that may not necessarily be the same as the
16	Q Okay. So so every PTP functionality	16	spec.
17	every aspect of PTP functionality that you implemented	17	Q Okay. Did you have any role in developing
18	in Cisco's industrial Ethernet devices are based on	18	the PTP standard marked as Exhibit 93?
19	the IEEE standard marked as Exhibit 93?	19	A You mean contributing to the standard itself?
20	MR. PAK: Objection; mischaracterizes the	20	Q Yes.
21	witness' testimony.	21	A No.
22	MR. WONG: Q. Correct?	22	Q Did you contribute to the standard that
23	MR. PAK: Assumes facts not in evidence.	23	preceded the standard marked as Exhibit 93?
24	THE WITNESS: There are multiple parts of it	24	And I believe you called that PTP version 1.
25	for the implementation part. There is the protocol	25	A No.
			12 10.
	Page 98		Page 100
	· · · · · · · · · · · · · · · · · · ·		rage 100
1	part, which are the messages, the state machine, the	1	Q Did you have any role in drafting the
1 2		1 2	-
	part, which are the messages, the state machine, the		Q Did you have any role in drafting the
2	part, which are the messages, the state machine, the field definitions. Those we base off the the spec.	2	Q Did you have any role in drafting the document that is marked as Exhibit 93?
2 3	part, which are the messages, the state machine, the field definitions. Those we base off the the spec. There are the way we calculate the clock difference.	2 3	Q Did you have any role in drafting the document that is marked as Exhibit 93? A No.
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2 3 4 5	part, which are the messages, the state machine, the field definitions. Those we base off the the spec. There are the way we calculate the clock difference. Those are not documented here. Those are what we developed. And there's also the CLI command which we	2 3 4 5	Q Did you have any role in drafting the document that is marked as Exhibit 93? A No. Q Do you know I think I know the answer but do you know if Mr. Bilstead had any role in developing the standard marked as Exhibit 93? A I don't know anything about that part.
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	Page 105		Page 107
1	MR. WONG: Q that PTP meant precision	1	lists the PTP which lists PTP as an acronym;
2	time protocol?	2	correct?
3	MR. PAK: Same objections.	3	MR. PAK: Objection; vague.
4	THE WITNESS: I don't think it's well known	4	THE WITNESS: I would say the meanings are
5	in the entire networking industry.	5	the same, that they mean precision time protocol.
6	MR. WONG: Okay.	6	MR. WONG: Q. Well, the the words are the
7	Q Was there a subset of the networking industry	7	same, too; correct?
8	where PTP was known to refer to the PTP in Exhibit 93?	8	PTP in the command is the same three letters
9	MR. PAK: Objection; vague; calls for	9	that appear on page 8 of Exhibit 93; correct?
10	speculation; assumes facts not in evidence.	10	A It's the same acronym.
11	THE WITNESS: It's not as normal a term as IP	11	Q And they're referring to the same protocol;
12	or MAC. The the term is still I think even for	12	correct?
13	people who are working on the Catalyst switches, it's	13	A Yes.
14	not a very well-known term.	14	Q Now, if you'll turn to page 4 of Exhibit 93.
15	MR. WONG: Okay.	15	A (Witness complies.) Okay.
16	Q But certainly, the IEEE standard marked as	16	Q You can take off the well
17	Exhibit 93 defines the PTP acronym; correct?	17	A This is
18	A Yes.	18	Q maybe you want to keep that together,
19	Q And uses the PTP acronym	19	actually.
20	A Yes.	20	A Right.
21	Q to describe precision time protocol;	21	Q On page 4 of Exhibit 93, there is a large
22	correct?	22	heading No. 3 entitled:
23	A True.	23	"Definitions, acronyms, and abbreviations."
24	Q And it uses that PTP acronym to describe the	24	Do you see that?
25	PTP functionality that you implemented in Cisco's	25	A Yes.
	Page 106		Page 108
1	industrial Ethernet devices; right?	1	Q And then subsection 3.1 says "Definitions."
2	MR. PAK: Objection; assumes facts not in	2	Do you see that?
3	evidence; mischaracterizes the witness' prior	3	A Yes.
4	testimony.	4	Q Definition 3.1.4 in the IEEE PTP
5	THE WITNESS: In this spec, yes.	5	specification defines the term "clock."
6	MR. WONG: Q. Well, is PTP used in Cisco's	6	Do you see that?
7	industrial Ethernet device in a different way than	7	A Yes, uh-huh.
8	what PTP means in Exhibit 93?	8	Q What is the definition of clock in the IEEE
9	MR. PAK: Objection; vague.	9	standard?
10	MR. WONG: Let me rephrase the question.	10	A It's no participating in the precision time
11	Q In the five commands that you're associated	11	protocol, PTP, that is capable of providing a
12	with in Exhibit 92	12	measurement of the passage of time since a defined
13	A Right.	13	epoch.
14	Q all of them use the acronym PTP; correct?	14	Q And you have read these definitions before
15	A Yes.	15	you began developing the PTP functionality in Cisco's
16	Q That PTP refers to the same PTP that is shown	16	industrial Ethernet devices; right?
17	on page 8 of Exhibit 93; right?	17	A Yes.
18	MR. PAK: Objection; vague.	18	Q So you were familiar with these IEEE defined
19	THE WITNESS: I think when I chose the	19	terms before you began working on the PTP
20	command, yes, I used PTP to mean the same as precision	20	functionality; correct?
21 22	time protocol	21 22	A Yes.
23	MR. WONG: Right. THE WITNESS: as in the spec.	23	Q And you knew they were in the IEEE standard; correct?
23	MR. WONG: Q. As in the spec and, in fact,	24	A Yes.
25	as in as on page 8 of Exhibit 93, correct, which	25	Q Okay. Now, the definition of clock that you
25	as in as on page o of Eamon 73, correct, which		Q Okay. Now, the definition of clock that you

	Page 109		Page 111
1	read, is that your understanding of what a clock is in	1	Q If you'd turn to page 53 of Exhibit 93. Let
2	the context of PTP?	2	me know when you're there.
3	MR. PAK: Objection; vague.	3	A 53?
4	THE WITNESS: So, in the context of PTP	4	Q The ending control number for that is '31805.
5	standard or spec, yes, a clock means this.	5	A (Witness complies.) Yeah, I found it.
6	MR. WONG: Q. A clock means what it says on	6	Q Okay. If you look above so, near the
7	page 4 of	7	bottom of the page, you see in bold:
8	A Yes.	8	"7.6.2 PTP Device Attributes."
9	Q Exhibit 93?	9	Do you see that?
10	A Right.	10	A Yes.
11	Q And you you you did not come up with	11	Q Okay. Right above that, there are there
12	the term clock in the context of PTP; correct?	12	are two sort of indented bullet points, I guess, or
13	A No.	13	dashes.
14	Q All right.	14	Do you see that?
15	Clock is just a defined term in the IEEE	15	A (Witness nods head.)
16	standard marked as Exhibit 93; correct?	16	Q And then, right above that is a sentence that
17	A Yes.	17	begins with the words "ordinary and boundary clocks."
18	Q Okay. If you'll look at page 6 of	18	Do you see that?
19	Exhibit 93.	19	A Ordinary and boundary clocks.
20	A (Witness complies.) Right.	20	Q Yep.
21	Q Term 3.1.23; do you see that?	21	A Okay.
22	It defines the term "parent clock" correct?	22	Q So that full sentence says:
23	A Yes.	23	"Ordinary and boundary clocks may keep
24	Q What's the definition of parent clock?	24	statistics on the performance of their parents using
25	A The master clock to which a clock is	25	the following attributes."
			110 10110 H 111g 411110 41100.
	Page 110		Page 112
I			
1	synchronized.	1	Do you see that?
1 2	synchronized. Q And is that your understanding of what a	1 2	
			Do you see that?
2	Q And is that your understanding of what a	2	Do you see that? A I haven't found that sentence.
2	Q And is that your understanding of what a parent clock is in the context of PTP?	2 3	Do you see that? A I haven't found that sentence. Oh, yeah, found it.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q And is that your understanding of what a parent clock is in the context of PTP? A It is. Q And you get that understanding from the IEEE standard marked as Exhibit 93; correct? A Yes. Q All right. You don't disagree with that definition; correct? A No. Q And you don't disagree with the definition of clock in the IEEE PTP standard; right? A No, I don't. Q Okay. Now, the term parent also refers to	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Do you see that? A I haven't found that sentence. Oh, yeah, found it. Q Okay. That sentence in the IEEE standard uses the term parents; do you see that? A Yes. Q Is it your understanding that that that parents term refers to a parent clock? MR. PAK: If you need to take some time to look at the document more closely, you can do that. THE WITNESS: Yes. MR. PAK: Okay. THE WITNESS: I think it it's referring to the parent clock. MR. WONG: Right. Q There's no ambiguity in the context of the IEEE standard that parent refers to parent clock;
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And is that your understanding of what a parent clock is in the context of PTP? A It is. Q And you get that understanding from the IEEE standard marked as Exhibit 93; correct? A Yes. Q All right. You don't disagree with that definition; correct? A No. Q And you don't disagree with the definition of clock in the IEEE PTP standard; right? A No, I don't. Q Okay. Now, the term parent also refers to the parent clock in a PTP context; correct? A The term parent MR. PAK: Objection; vague. THE WITNESS: in this document MR. WONG: Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Do you see that? A I haven't found that sentence. Oh, yeah, found it. Q Okay. That sentence in the IEEE standard uses the term parents; do you see that? A Yes. Q Is it your understanding that that that parents term refers to a parent clock? MR. PAK: If you need to take some time to look at the document more closely, you can do that. THE WITNESS: Yes. MR. PAK: Okay. THE WITNESS: I think it it's referring to the parent clock. MR. WONG: Right. Q There's no ambiguity in the context of the IEEE standard that parent refers to parent clock; right? A Yes. Here, it means yeah, it does mean parent clock.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q And is that your understanding of what a parent clock is in the context of PTP? A It is. Q And you get that understanding from the IEEE standard marked as Exhibit 93; correct? A Yes. Q All right. You don't disagree with that definition; correct? A No. Q And you don't disagree with the definition of clock in the IEEE PTP standard; right? A No, I don't. Q Okay. Now, the term parent also refers to the parent clock in a PTP context; correct? A The term parent MR. PAK: Objection; vague. THE WITNESS: in this document MR. WONG: Yes. THE WITNESS: whenever yeah, a parent clock is used, it means the definition here.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Do you see that? A I haven't found that sentence. Oh, yeah, found it. Q Okay. That sentence in the IEEE standard uses the term parents; do you see that? A Yes. Q Is it your understanding that that that parents term refers to a parent clock? MR. PAK: If you need to take some time to look at the document more closely, you can do that. THE WITNESS: Yes. MR. PAK: Okay. THE WITNESS: I think it it's referring to the parent clock. MR. WONG: Right. Q There's no ambiguity in the context of the IEEE standard that parent refers to parent clock; right? A Yes. Here, it means yeah, it does mean parent clock. Q Okay. So, in the context of the PTP standard, referring to the parent of a clock is
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q And is that your understanding of what a parent clock is in the context of PTP? A It is. Q And you get that understanding from the IEEE standard marked as Exhibit 93; correct? A Yes. Q All right. You don't disagree with that definition; correct? A No. Q And you don't disagree with the definition of clock in the IEEE PTP standard; right? A No, I don't. Q Okay. Now, the term parent also refers to the parent clock in a PTP context; correct? A The term parent MR. PAK: Objection; vague. THE WITNESS: in this document MR. WONG: Yes. THE WITNESS: whenever yeah, a parent clock is used, it means the definition here. MR. WONG: Sure.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Do you see that? A I haven't found that sentence. Oh, yeah, found it. Q Okay. That sentence in the IEEE standard uses the term parents; do you see that? A Yes. Q Is it your understanding that that that parents term refers to a parent clock? MR. PAK: If you need to take some time to look at the document more closely, you can do that. THE WITNESS: Yes. MR. PAK: Okay. THE WITNESS: I think it it's referring to the parent clock. MR. WONG: Right. Q There's no ambiguity in the context of the IEEE standard that parent refers to parent clock; right? A Yes. Here, it means yeah, it does mean parent clock. Q Okay. So, in the context of the PTP standard, referring to the parent clock that we

Q Okay. Now, if you look on that same page, underneath the heading "PTP Device Attributes," you see the term "Priority I?" A Yes. Q What is a PTP device attribute? A It's certain characteristics of a PTP clock. O That are defined by the HEEF standard; correct? A Yes, uh-huh. Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard, correct? A R. Post. Objection; calls for expert testimony. MR. PONG: Q. If you know. A I didn't see anything as mandatory here. Q Okay. If you read the description of priority 1, it says: "The attribute priority 1 is used in the execution of the best master clock algorithm; see initialization value of priority 1 shall be configurable to any value in the range 0 to 255, unless restricted by limits established by an Page 114 applicable PTP protocol"—I'm sorry—"PTP profile." Do you see that? A Yes. Q Okay. If your date the description of priority 1 shall be configurable. Do you see that? A Yes. C Q Okay. If you'd turn back to page 53 that we were just on. A (Witness complies.) Okay. A Yes. C Q Okay. If you'd turn back to page 53 that we were just on. A (Witness complies.) Right. Page 114 A Yes. Do you see that? A Yes. Do you see that? A Yes. C Q Okay. If you'd turn back to page 53 that we were just on. A (Witness complies.) Right. Page 115 A Yes. A Yes. C Q Okay. If you'd turn back to page 53 that we were just on. A (Witness complies.) Right. Page 116 Q So, it is a – it is a requirement to comply with the standard for there to be a value of priority 1 shall be configurable. A Yes. C Q Okay. If you'd turn to the next page in Exhibit 93. A Yes. C Q Okay. If you'd turn to the next page in Exhibit 93. A Yes. C Q Okay. If you'd turn to the next page in Exhibit 93. A Yes. C Q Okay. If you'd turn to the next page in Exhibit 93. C Q Okay. If you'd turn to the next page in Exhibit 93. C Q Okay. If you'd turn to the next page in Exhibit 93. C Q Okay. If you'd turn to the next page in Exhibit 93. C Q Okay. If you'd turn to the next page i	1	Page 113		Page 115
2 undemeath the heading "PTP Device Attributes," you 3 see the term "Priority 1"? 4 A Yes. 5 Q What is a PTP device attribute? 6 A It's certain characteristics of a PTP clock, 7 Q That are defined by the IEEE standard; 8 correct? 9 A Yes, uh-huh. 10 Q Okay, And these are device attributes that 11 are mandatory to be supported to comply with the PTP 12 standard; correct? 13 MR. PAK: Objection; calls for expert 14 testimony. 15 MR. WONG: Q. If you know. 16 A I didn't see anything as mandatory here. 17 Q Okay, If you read the description of priority 1 is used in the minimalization value of priority 1 is used in the configurable to any value in the range 0 to 255, unless restricted by limits established by an Page 114 1 applicable PTP protocol" I'm sorry "PTP profile." 2 D O Nay, Now, the the definition says the value of priority 1 be configurable. 3 Did I read that correctly? 4 A Yes. 5 Q O Kay, Now, the the definition says the value of priority 1 be configurable. 6 Value priority: I is an anadatory term in the IEEE standard; correct? 1 MR. PAK: Same objection; calls for expert testimony. 1 MR. PAK: Same objection; calls for expert testimony. 2 MR. PAK: Objection; calls for expert testimony. 3 Q And thus sar Profile the value of priority 1 is applicable or profile. The standard to profile is an anadatory term in the IEEE standard; correct? 4 A Yes. 5 Q Okay, Now, the the definition says the value of priority 1 sall be configurable. 5 MR. PAK: Same objection; calls for expert testimony. 5 MR. PAK: Same objection; calls for expert testimony. 5 MR. PAK: Objection; calls for expert testimony. 5 MR. WONG: Q. And it may help 5 A (Witness complies.) Okay. 6 Q And thus its applicable the middle of the page. 7 Do you see that? 8 A Yes. 9 Q Shall" is a mandatory term in the IEEE standard; correct? 9 A Yes. 9 Q Shall" is a mandatory term in the IEEE standard; correct? 10 Q Okay, If you'd turn to the next page in Exhibit of the call that the call the description of priority 2 shall be configurable. 14 A Y		O Okay. Now, if you look on that same page.	1	Exhibit 93.
see the term "Priority I"? 4 A Yes. 5 Q What is a PTP device attribute? 6 A It's certain characteristics of a PTP clock, 7 Q That are defined by the IEFE standard; 8 correct? 9 A Yes, uh-huh. 10 Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard; correct? 12 A Yes. 13 MR. PAK: Objection, calls for expert testimony. 14 testimony. 15 MR. WONG: Q. If you know. 16 A I didn't see anything as mandatory here. 17 Q Okay. If your date description of priority I is used in the execution of the best master clock algorithm; see execution of the best master clock algorithm; see 2 19 y.3.2. Lower values take precedence. The initialization value of priority I, it sughts. 10 applicable PTP protocol" I'm sorry "PTP profile." 11 applicable PTP protocol" I'm sorry "PTP profile." 12 A Yes. 13 Q And you see right in the middle of the page, it is anys "word usage"; correct? 14 A Yes. 15 Q Or And this is and you you read the entire standard before you implemented any of the functionality with Cisco's products; right? 12 A Yes. 13 Q The definition of "shall" well, why don't you please read the definition of "shall" requirements strictly to be followed in order to conform to the standard and from which no deviation is permitted." 14 applicable PTP protocol" I'm sorry "PTP you profile." 15 A Yes. 16 Q Shall is a mandatory term in the IEEE you please read the definition says the value of priority I shall be configurable to a value of priority I shall be configurable. 15 A Yes. 16 Q Shall" is a mandatory term in the IEEE you please read the definition of the standard for there to be a value of priority I hard to one page 53? 17 A Yes. 18 A Yes. 19 Q Shall" is a mandatory term in the IEEE you please read the definition of priority I here on page 53? 18 A Yes. 19 Q Shall" is a mand	2			
4 A Yes. 5 Q What is a PTP device attribute? 6 A It's certain characteristics of a PTP clock. 7 Q That are defined by the IEEE standard; 8 correct? 9 A Yes, uh-hub. 10 Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard; correct? 11 are mandatory to be supported to comply with the PTP standard; correct? 12 Standard; correct? 13 MR. PAK: Objection; calls for expert testimony. 14 testimony. 15 MR. WONG: Q. If you know. 16 A I didn't see anything as mandatory here. 17 Q Okay. If you read the description of priority 1, it says: 18 "The attribute priority I is used in the continuous testion of the best master clock algorithm; see excition of the best master clock algorithm; see excition of the best master elock algorithm; see excition of the standard; correct? 1	3	•	3	
5 Q What is a PTP device attribute? 6 A It's certain characteristics of a PTP clock. 7 Q That are defined by the IEEE standard; 8 correct? 9 A Yes, uh-huh. 10 Q Okay. And these are device attributes that 11 are mandatory to be supported to comply with the PTP 2 standard; correct? 12 MR. PAK: Objection; calls for expert 13 MR. WONG: Q. If you know. 15 MR. WONG: Q. If you know. 16 A I didn't see anything as mandatory here. 17 Q Okay. If you read the description of priority 1, it says: 18 PTP profile. The value of priority 1 is used in the 20 execution of the best master clock algorithm; see 21 9.3.2. Lover values take precedence. The 22 initialization value of priority 1 is shall be 23 execution of the best master clock algorithm; see 24 configurable to any value in the range to a 255, 25 unless restricted by limits established by an Page 114 1 applicable PTP protocol* "- I'm sorry - "PTP 2 profile." 2 Do you see that? 3 A Yes. 4 Yes. 5 Q Okay. Now, the — the definition says the 3 value of priority 1 shall be configurable. 5 Q Okay. Now, the — the definition says the 4 value of priority 1 shall be configurable. 6 Value of priority 1 shall be configurable. 7 Do you see that? 8 A Yes. 9 Q "Shall" is a mandatory term in the IEEE 10 standard; correct? 11 MR. PAK: Same objection; calls for expert 12 testimony. 13 MR. PAK: Same objection; calls for expert 14 testimony. 15 MR. PAK: Same objection; calls for expert 16 Q "Shall" is a mandatory term - strike that. 17 "Shall" indicates a mandatory requirement in the IEEE standard; correct? 18 MR. PAK: Same objection; calls for expert 19 MR. PAK: Same objection; calls for expert 10 testimony. 10 A "The word 'shall,' which is equivalent to 'is required to,' is used to indicate mandatory 'requirements tricity to be foliority and from which no deviation is permitted." 19 Q Okay. If you'd unraback to page 53 that we were just on the standard; correct? 11 A Yes. 12 Q Okay. If you'd turn back to page 53 that we were just on the standard for there to be a value of priority! I sha	4	· · · · · · · · · · · · · · · · · · ·	4	
6 A If's certain characteristics of a PTP clock. 7 Q That are defined by the IEEE standard; 8 correct? 9 A Yes, uh-huh. 10 Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard; correct? 11 A Yes. 12 Standard; Correct? 13 MR. PAK: Objection; calls for expert testimony. 14 testimony. 15 MR. WONG: Q. If you know: 16 A I didn't see anything as mandatory here. 17 Q Okay. If you read the description of priority 1, it says: 18 "The attribute priority 1 is used in the execution of the best master clock algorithm; see 2 y 3.2. Lower values take precedence. The initialization value of priority 1 is all be configurable to any value in the range 0 to 255, 25 unless restricted by limits established by an 2 profile. The value of priority 1 is shall be configurable. 10 A Yes. 11 Applicable PTP protocol"—I'm sorry—"PTP profile." 12 applicable PTP protocol"—I'm sorry—"PTP profile." 13 Did I read that correctly? 14 A Yes. 15 Q Okay. Now, the—the definition says the value of priority 1 shall be configurable. 16 Q "Shall" is a mandatory term in the IEEE standard; correct? 17 A Yes. 18 A Yes. 19 Q "Shall" is a mandatory term in the IEEE standard; correct? 10 MR. PAK: Same objection; calls for expert testimony. 10 MR. WONG: Sure. 11 MR. WONG: Q. And it may help— 11 MR. WONG: Q. And it may help— 12 MR. WONG: Q. And it may help— 13 Oyay ou see that? 14 Yes. 15 A Yes. 16 Q "Shall" is a mandatory term in the IEEE standard; correct? 17 Do you see that? 18 A Yes. 19 MR. WONG: Q. And it may help— 19 MR. PAK: Objection; calls for expert testimony. 10 MR. WONG: Q. And it may help— 21 MR. WONG: Q. And it may help— 22 MR. WONG: Q. And it may help— 23 MR. WONG: Q. And it may help— 24 MR. Wong: Q. And it may help— 25 MR. Wong: Q. And it may help— 26 MR. Wong: Q. And it may help— 27 Do you see that? 28 A Yes. 29 Q "Shall" is a mandatory term — strike that. 29 MR. Wong: Q. And it may help— 20 MR. Wong: Q. And it may help— 21 MR. Wong: Q. And it may help— 22 MR. Wong: Q. And it may help— 23 MR.	5	Q What is a PTP device attribute?	5	•
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8 correct? 9 A Yes, uh-huh. 10 Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard; correct? 12 standard; correct? 13 MR. PAK: Objection; calls for expert testimony. 14 testimony. 15 MR. WONG: Q. If you know. 16 A I didn't see anything as mandatory here. 17 Q Okay. If you read the description of priority I, it says: 18 priority I, it says: 19 "The attribute priority I is used in the execution of the best master clock algorithm; see 20 execution of the best master clock algorithm; see 21 93.2. Lower values take precedence. The initialization value of priority I shall be configurable to any value in the range 0 to 255, unless restricted by limits established by an 25 Q Okay. If you'd turn back to page 53 that we were just on. 19 Page 114 applicable PTP protocol" I'm sorry "PTP profile." 20 Did I read that correctly? 31 Did I read that correctly? 42 A Yes. 43 A Yes. 44 Yes. 54 Q Okay. Now, the the definition says the value of priority I shall be configurable. 55 Q Okay. Now, the the definition says the value of priority I shall be configurable. 56 Q Shall" is a mandatory term in the IEEE standard; correct? 57 Do you see that? 58 A Yes. 59 Q "Shall" is a mandatory term in the IEEE standard; correct? 50 Q Shall" is a mandatory term strike that. 51 THE WITNESS: Would you please rephrase that question. 52 Q Shall" is a mandatory term strike that. 53 MR. WONG: Q. And it may help 54 A Yes. 55 Q At the top, it has another attribute, "priority 2 also has a sentence that says." 56 A Yes. 57 Q Shall" is a mandatory term strike that. 58 A Yes. 59 Q "Shall" is a mandatory term strike that. 59 A Yes. 60 Q "Shall" indicates a mandatory requirement in the IEEE standard; correct? 61 Q Shall indicates a mandatory term strike that. 62 Q Shall in dicates a mandatory term strike that. 63 A Yes. 64 Q "Shall" indicates a mandatory requirement in the IEEE standard; correct? 75 Q A The definition of priority 2 shall be configurable. 76 Q Shall in dica	7	Q That are defined by the IEEE standard;	7	Do you see that?
10 Q Okay. And these are device attributes that are mandatory to be supported to comply with the PTP standard: correct?	8		8	-
are mandatory to be supported to comply with the PTP standard, correct? MR. PAK: Objection; calls for expert MR. WONG: Q. If you know. A I didn't see anything as mandatory here. Q Okay. If you read the description of priority 1, it says: "The attribute priority 1 is used in the execution of the best master clock algorithm; see "The attribute priority 1 is specified in a priority 1 is such as a priority 1 is specified in a priority 1 is supplicable priority 1 is specified in a priority 1 is any value in the range 0 to 255, unless restricted by limits established by an Page 114 applicable PTP protocol" I'm sorry "PTP profile." Do you see that? A Yes. Q Okay. Now, the the definition says the value of priority 1 is all be configurable. Do you see that? A Yes. Q Okay. Now, the the definition says the value of priority 1 is a mandatory term in the IEEE MR. PAK: Same objection; calls for expert testimony. MR. WONG: Q. And it may help MR. WONG: Q. And the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, why don't you please read the definition of "shall" well, whe definition of "shall" well, who dicate mandatory requirements strictly to be followed in order to conform to the standard and from which no deviation is permitted." A "The word'shall, wach is a endadrory requirements strictly to be followed in order to conform to the standard and	9	A Yes, uh-huh.	9	Q And this is and you you read the entire
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25 Q If you'd turn to page 9 of the same document, 25 Do you see that?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Did I read that correctly? A Yes. Q Okay. Now, the the definition says the value of priority 1 shall be configurable. Do you see that? A Yes. Q "Shall" is a mandatory term in the IEEE standard; correct? MR. PAK: Same objection; calls for expert testimony. THE WITNESS: Would you please rephrase that question. MR. WONG: Sure. Q "Shall" is a mandatory term strike that. "Shall" indicates a mandatory requirement in the IEEE standard; correct? MR. PAK: Objection; calls for expert testimony. MR. WONG: Q. And it may help A I can say only my understanding, that it's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	with the standard for there to be a value of priority 1 that is configurable as described here on page 53; correct? A Yes. MR. PAK: Same and again same objection; calls for expert testimony. MR. WONG: Q. If you'd turn I'm sorry. And and do you have any disagreements with the description of priority 1 here on page 53? A No. Q Okay. If you'd turn to the next page in Exhibit 93. A (Witness complies.) Q At the top, it has another attribute, "priority 2." Do you see that? A Yes. Q And the definition of priority 2 also has a sentence that says: "The value of priority 2 shall be configurable to any value in the range 0 to 255,

	Page 117		Page 119
1	A Uh-huh, yes.	1	said, as required it's required to be
2	Q So the value of priority 2 strike that.	2	interoperable
3	So it's a requirement to comply with the PTP	3	MR. WONG: Okay.
4	standard for the value of priority 2 to be	4	THE WITNESS: at the PlugFest.
5	configurable as described here on page 54; correct?	5	MR. WONG: Q. So, to comply with the PTP
6	MR. PAK: Same objection; calls for expert	6	standard, there have to be configurable device
7	testimony.	7	attributes called priority 1 and priority 2 as
8	THE WITNESS: Yes, it's a parameter.	8	described on pages 53 and 54 of Exhibit 93?
9	MR. WONG: Right.	9	MR. PAK: Objection; calls for expert
10	THE WITNESS: Right.	10	testimony. Objection; vague.
11	Q And that's your understanding, based upon the	11	THE WITNESS: My understanding is these two
12	standard's own definition of what "shall" means within	12	parameters, which needs to be configurable.
13	the document; correct?	13	MR. WONG: Okay.
14	A Yes.	14	Q To comply with the PTP standard?
15	Q Okay. And when you implemented the PTP	15	A Yes.
16	functionality in Cisco's devices, was it your	16	Q Okay. If you'd turn to page 62 of that same
17	intention to comply with the standard with the IEEE	17	document, Exhibit 93. Let me know when you're there.
18	standard marked as Exhibit 93?	18	A (Witness complies.) Yes, I'm on page 63.
19	MR. PAK: Objection; vague.	19	Q 62. I'm sorry.
20	THE WITNESS: Again, there were certain	20	A 62. (Witness complies.) Okay.
21	multiple aspects of it; right?	21	Q Okay. About two-thirds down on that page 62,
22	MR. WONG: Q. But, with respect to the two	22	there is a subheading 7.7.2.3.
23	device attributes that we just discussed, was it your	23	Do you see that?
24	intention to comply with the IEEE standard?	24	A Yes.
25	MR. PAK: Same objection; vague.	25	Q And the text next to that is:
	wik. FAR. Same objection, vague.	23	7 And the text flext to that is.
	Page 118		_ 100
	1 age 110		Page 120
1	THE WITNESS: I think we intended to make	1	"Sync (multicast) message transmission
1 2	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock.	2	"Sync (multicast) message transmission interval."
	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we	1	"Sync (multicast) message transmission
2	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we shall make these as configurable values.	2 3 4	"Sync (multicast) message transmission interval." Do you see that? A Yes.
2	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we	2 3	"Sync (multicast) message transmission interval." Do you see that? A Yes. Q Now, the sentence below that says:
2 3 4	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we shall make these as configurable values. MR. WONG: Q. As required by the IEEE standard marked as	2 3 4	"Sync (multicast) message transmission interval." Do you see that? A Yes. Q Now, the sentence below that says: "The port DS.log sync interval shall specify
2 3 4 5	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we shall make these as configurable values. MR. WONG: Q. As required by the IEEE standard marked as A Yes.	2 3 4 5	"Sync (multicast) message transmission interval." Do you see that? A Yes. Q Now, the sentence below that says: "The port DS.log sync interval shall specify the mean time interval between successive sync
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2 3 4 5 6 7 8	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we shall make these as configurable values. MR. WONG: Q. As required by the IEEE standard marked as A Yes. Q Exhibit 93; correct? A Yes. Q Is it possible to have vendor	2 3 4 5 6 7 8 9	"Sync (multicast) message transmission interval." Do you see that? A Yes. Q Now, the sentence below that says: "The port DS.log sync interval shall specify the mean time interval between successive sync messages, i.e., the sync interval, when transmitted as multicast messages." Do you see that?
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2 3 4 5 6 7 8 9 10 11 12 13 14	THE WITNESS: I think we intended to make these two parameters as configurable for PTP clock. So, for that part, yes, the compliance is that we shall make these as configurable values. MR. WONG: Q. As required by the IEEE standard marked as A Yes. Q Exhibit 93; correct? A Yes. Q Is it possible to have vendor interoperability for PTP if you don't comply with the PTP standard? MR. PAK: Objection; calls for expert testimony; vague.	2 3 4 5 6 7 8 9 10 11 12 13 14	"Sync (multicast) message transmission interval." Do you see that? A Yes. Q Now, the sentence below that says: "The port DS.log sync interval shall specify the mean time interval between successive sync messages, i.e., the sync interval, when transmitted as multicast messages." Do you see that? A Yes. Q Did I read that correctly? A Yes. Q So the and that sentence, by the way, uses
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	Page 121		Page 123
1	A Yes, uh-huh.	1	A Yes.
2	Q That definition of "shall" says that no	2	Q And at the top of Exhibit 95, there is a
3	deviation is permitted; correct?	3	"From" field on the e-mail.
4	If you need to look at page 9, you can	4	Do you see that?
5	confirm that.	5	A Yes.
6	A Right. No deviation of the behavior, I	6	Q And it says "Toni Liu."
7	guess.	7	Do you see that?
8	Q Okay.	8	A Yes.
9	A Right.	9	Q That's you; correct?
10	Q Is that your understanding?	10	A Yes.
11	A Right.	11	Q Your e-mail address while at Cisco was
12	Q So turning so you're still on page 62.	12	liut@cisco.com; correct?
13	The IEEE standard uses the term "sync interval" to	13	A Yes.
14	describe the mean time interval between successive	14	Q Now, was your e-mail address the same as it
15	sync messages; correct?	15	was in your second period at Cisco as it was at
16	A Sync interval as specified in the text here?	16	your first period at Cisco?
17	Q Yes.	17	A It's the same.
18	A Right. Yes.	18	Q It's the same?
19	Q So, do you agree that the IEEE standard	19	A Yes.
20	marked as Exhibit 93 on page 62 defines the sync	20	Q Okay. And this was this e-mail, marked as
21	interval as the mean time interval between successive	21	Exhibit 95, was sent on June 25th, 2008; correct?
22	sync messages when transmitted as multicast messages?	22	A Yes.
23	A Yes.	23	Q Okay. All right. Set that down for a
24	Q Okay. Do you have any disagreements with	24	moment.
25	that definition?	25	MR. WONG: Let's mark this one as Exhibit 96.
	Page 122		Page 124
1	A No.	1	(Document marked Exhibit 96
2	Q Okay. Is that your understanding of what a	2	for identification.)
3	sync interval is in the context of PTP?	3	MR. WONG: This is 96.
4	A Yes.	4	Q The court reporter has marked as Exhibit 96 a
5	MR. PAK: Objection; calls for expert	5	document bearing control Nos. CSICLI00608739 to '740.
6	testimony.	6	Please take a moment to look at this document.
7	MR. WONG: I'm going to mark two exhibits	7	A (Witness complies.) Okay.
8	right now. This one will be what number are we on?	8	Q This is also an e-mail; correct?
9	THE REPORTER: 95.	9	A Yes.
10	MR. WONG: Okay. This one will be 95.	10	Q At the very top, there's a "From" field for
11	(Document marked Exhibit 95	11	this e-mail.
12	for identification.)	12	Do you see that?
13	MR. WONG: 95. I'll do them one at a time.	13	A Yes.
14	Okay.	14	Q It also says it's from liut@cisco.com, Toni
15	Q So the court reporter has marked as	15	Liu?
16	Exhibit 95 the document with control	16	A Yes.
17	Nos. CSICLI00846643, and that's it.	17	Q That's you; correct?
18	A Uh-huh.	18	A True.
19	Q Ms. Liu, do you recognize this document?	19	Q Do you have any doubt that you sent this
20	A Yes.	20	e-mail marked as Exhibit 96?
21	Q Is this one of the documents that refreshed	21	A I don't have any doubt I sent it.
	your recollection as to prior events?	22	Q Okay. And the exhibit marked as Exhibit 95,
22			
23	A Yes.	23	do you have any doubt that you sent that e-mail?
		23 24	do you have any doubt that you sent that e-mail? A No. Q Okay. Now, if you look at Exhibit 95 and

	Page 137		Page 139
1	AFTERNOON SESSION	1	MR. WONG: Okay.
2	1:41 P.M.	2	Q And you in describing the function
3		3	performed by the "PTP priority 1" command, you
4		4	testified that it configures the priority 1 parameter
5		5	for the PTP clock; correct?
6	THE VIDEOGRAPHER: We are back on the record.	6	A Yes.
7	It is 1:41.	7	Q And the priority 1 parameter for the PTP
8	MR. WONG: Q. So, Ms. Liu, before the lunch	8	clock, that's the same priority 1 parameter that we
9	break, we talked about the five commands that are	9	discussed in Exhibit 93; correct?
10	associated with you in Exhibit 92.	10	A When you say "parameter," I think they are a
11	A Yes.	11	little different in the CLI and the spec.
12	Q One of the commands is "PTP priority 1."	12	Q How are they different?
13	A Yes.	13	A The in the spec, it's the attribute of the
14	Q Do you see that?	14	clock; right? When I say parameter, I mean the in
15	A Uh-huh.	15	the context of the CLI command is a parameter.
16	Q What is the function that the "PTP	16	Q Oh, I see.
17	priority 1" command performs?	17	So so the word priority 1 in the "PTP
18	A It configures the priority 1 parameter for	18	priority 1" CLI command is a parameter of the command?
19	the PTP clock.	19	A Yes.
20	Q Okay. And when you say "for the PTP clock,"	20	Q That's what you mean by
21	you mean PTP as defined by the IEEE standard; right?	21	A Right.
22	A Yes.	22	Q parameter?
23	Q You're not talking about a different PTP	23	A Right.
24	that's separate from the IEEE standard; right?	24	Q Okay. Now, does the priority 1 parameter in
25	A No.	25	the CLI command "PTP priority 1," does that refer to
	T 100		7 140
_	Page 138		Page 140
1	Q Okay. And the PTP in the command "PTP	1	the priority 1 attribute in the IEEE standard marked
2		1 -	= -
2	priority 1" refers to the IEEE standard; correct?	2	as Exhibit 93?
3	MR. PAK: Objection; vague.	3	as Exhibit 93? MR. PAK: Objection; vague.
3 4	MR. PAK: Objection; vague. THE WITNESS: It refers to, yeah, PTP.	3 4	as Exhibit 93? MR. PAK: Objection; vague. THE WITNESS: Yes. I think I chose it for
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3 4 5 6 7	MR. PAK: Objection; vague. THE WITNESS: It refers to, yeah, PTP. MR. WONG: Q. It refers to the IEEE PTP standard that we marked as Exhibit 93; correct? A Yes.	3 4 5 6 7	as Exhibit 93? MR. PAK: Objection; vague. THE WITNESS: Yes. I think I chose it for the intention to mean the priority 1 attribute of the clock. MR. WONG: Q. And is your answer the same
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3 4 5 6 7 8 9	MR. PAK: Objection; vague. THE WITNESS: It refers to, yeah, PTP. MR. WONG: Q. It refers to the IEEE PTP standard that we marked as Exhibit 93; correct? A Yes. Q Okay. And the use of the word PTP in all five of the commands that are associated with you in	3 4 5 6 7 8	as Exhibit 93? MR. PAK: Objection; vague. THE WITNESS: Yes. I think I chose it for the intention to mean the priority 1 attribute of the clock. MR. WONG: Q. And is your answer the same for the command "PTP priority 2"? Is the priority 2 command parameter does
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	Page 141		Page 143
1	routing software; right?	1	today
2	A Yes.	2	Q Okay.
3	Q How long did it take you to come up with the	3	A that I saw.
4	"PTP priority 1" command?	4	Q So the
5	A I don't remember how long it took for me to	5	A Yeah.
6	come up with the list of CLI commands.	6	Q So the same e-mails that were marked as
7	Q Okay. I'm just asking about the the one	7	exhibits in today's deposition are the ones that
8	command, "PTP priority 1."	8	refreshed your memory?
9	A Right.	9	A Right.
10	Q Did did that take you an hour to come up	10	Q Okay. How long did it take you to write
11	with that command?	11	the strike that.
12	MR. PAK: Objection; vague.	12	Did you write the implementing source code
13	THE WITNESS: You mean just to decide on the	13	for the "PTP priority 1" command
14	syntax of the command?	14	A I did write the source code for implementing
15	MR. WONG: On the two words in the command.	15	this command.
16	That's right.	16	Q How long did it take you to write the source
17	Q How long did it take you to decide on the	17	code for the "PTP priority 1" command?
18	two words, "PTP priority 1," in that command?	18	A I don't remember any time frame on this.
19	A I don't remember.	19	It's it's been a while.
20	Q Did it take you more than a day?	20	Q Do you know if it took you longer to write
21	MR. PAK: Objection; vague.	21	the implementing source code for the "PTP priority 1"
22	THE WITNESS: Maybe not. I don't recall the	22	command than it took you to choose the two words "PTP
23	details of of this level.	23	priority 1"?
24	MR. WONG: Okay.	24	MR. PAK: Objection; vague.
25	Q Do you	25	THE WITNESS: I would think it took longer to
	Page 142		Page 144
1	A How long, yeah.	1	implement it.
2	Q Are you done with your answer?	2	MR. WONG: Q. Would your answer be the same
3	A Right.	3	
			for the other four commands that are associated with
4	Yes, I'm done with my answer.	4	you in Exhibit 92?
4 5	Q Okay. Do you know if it took you just a few		you in Exhibit 92? A I know I gave some thought on these commands
5 6	Q Okay. Do you know if it took you just a few minutes?	4 5 6	you in Exhibit 92? A I know I gave some thought on these commands when I came up with them. But particular to how long
5 6 7	Q Okay. Do you know if it took you just a few minutes? MR. PAK: Same objections.	4 5 6 7	you in Exhibit 92? A I know I gave some thought on these commands when I came up with them. But particular to how long it took for me to do any of these, that's the part I
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	Page 145		Page 147
1	A Yes. I I agree	1	Q Okay. What function does the "PTP sync
2	Q Okay.	2	interval" command perform?
3	A that's likely true.	3	A It configures how often the clock syncs with
4	Q So that's likely true for the other four	4	the master.
5	commands as well?	5	Q And do you recall earlier we were looking at
6	MR. PAK: Objection; vague.	6	the IEEE standard marked Exhibit 93 and a term called
7	THE WITNESS: That's yeah, I can always	7	sync interval in there?
8	say that's likely true.	8	A Right.
9	MR. WONG: Okay.	9	Q Is the sync interval, that the "PTP sync
10	Q And you say "it's likely true" just based	10	interval" command refers to, the same sync interval
11	upon your experience programming?	11	that we discussed in Exhibit 93?
12	A It's yeah, it's just based on my	12	MR. PAK: Objection; vague.
13	experience working with CLI commands.	13	THE WITNESS: I think that was this
14	Q What type of programming is required to	14	command was used was defined to be used to
15	implement a command like "PTP priority 1"?	15	configure that part of the clock.
16	A It's a C programming that we were using. So	16	MR. WONG: Right.
17	for the in general, you do the front end of	17	Q And by "that part of the clock," you mean the
18	interface, so you come up with the command. But then	18	sync interval attribute defined by the IEEE PTP
19	you then you spend time implementing hooking it up	19	standard; right?
20	to the back-end code.	20	A Yes.
21	Q Excuse me.	21	Q Now, you chose the term priority 1 because
22	And when you say "back-end code," is that the	22	priority 1 is an attribute that's in the IEEE
23	same thing as the implementing source code?	23	standard; right?
24	That's the term that I was using.	24	MR. PAK: Objection; vague.
25	Is that the same thing, in your	25	THE WITNESS: You mean when I wrote the
	Page 146		Page 148
			2
1	understanding?	1	command?
1 2	understanding? A Yes.	1 2	
	· · · · · · · · · · · · · · · · · · ·		command?
2	A Yes. There so, when the CLI command is received, something needs to happen based on what has	2	command? MR. WONG: Q. When you A When I when I chose to use priority 1; right?
2 3	A Yes. There so, when the CLI command is received, something needs to happen based on what has been configured as being specified as the parameter.	2	command? MR. WONG: Q. When you A When I when I chose to use priority 1; right? Q Yes, that's what I'm asking.
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	Page 149		Page 151
1	to the command.	1	MR. WONG: Let me rephrase the question.
2	Is that what you mean	2	Q For a command "PTP priority 1" that sets an
3	MR. WONG: No, no. I'm	3	attribute that's called priority 1 in the spec, you
4	THE WITNESS: when you ask the question?	4	should use the same word in the command; correct?
5	MR. WONG: No, no.	5	MR. PAK: Objection; assumes facts not in
6	Q My question is simply: When you you	6	evidence.
7	testified that the one second.	7	THE WITNESS: No, I don't think that part was
8	Can you tell me again what the function is	8	true.
9	that the "PTP sync interval" performs.	9	For example, you could use clock priority 1
10	A It configures or determines how often the	10	or clock priority 2; right? There there is no
11	clock syncs with the master clock.	11	direct association of what I use in the command line
12	Q And that functionality is described in the	12	CLI that it has to match this spec. That's the
13	IEEE standard; correct?	13	that they are not equal.
14	A Yes.	14	MR. WONG: Okay.
15	Q And the IEEE standard uses the term sync	15	Q Well, priority 1 has a particular meaning in
16	interval to describe what you just described as the	16	the PTP context; correct?
17	function of the "PTP sync interval" command; right?	17	A Yes.
18	MR. PAK: Objection; vague.	18	Q And the "PTP priority 1" command performs the
19	THE WITNESS: It's the same meaning.	19	function in the PTP context; correct?
20	MR. WONG: Okay.	20	MR. PAK: Objection; vague; incomplete
21	Q So you chose the words sync interval for the	21	hypothetical.
22	"PTP sync interval" command because the IEEE standard	22	THE WITNESS: The yes, priority attribute
23	used the same term to describe what the command does;	23	is an important part of a PTP clock.
24	right?	24	MR. WONG: Q. And you chose commands that
25	MR. PAK: Objection; vague.	25	would be clear to a user trying to set these industry
	Page 150		D 150
	rage 100		Page 152
1	THE WITNESS: I chose it based on my	1	standard attributes; right?
1 2		1 2	
	THE WITNESS: I chose it based on my		standard attributes; right?
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	Page 153		Page 155
1	Q You were aware that the terms priority 1,	1	A "Show" is a
2	priority 2, sync interval, and PTP were defined in the	2	Q Sorry.
3	IEEE specification marked as Exhibit 93 before you	3	A big category of commands. Like, there is
4	added those three commands to Cisco's routing	4	debug. There is config. There is show. So show is
5	software; correct?	5	one big category of commands.
6	A I'm aware of those terms being defined in the	6	Q And there was a big and that category of
7	1588 standard.	7	commands, the show commands, existed before you added
8	Q Okay. Before you added those three commands	8	the "show PTP clock" command to the software; correct?
9	to the Cisco software; correct?	9	A Yes.
10	A Yes.	10	Q And you were just building upon that category
11	Q Okay. Now, "show PTP clock" is another	11	of commands when you used the word "show" in "show PTP
12	command that you're associated with; correct?	12	clock"; correct?
13	A Yes.	13	MR. PAK: Objection; mischaracterizes the
14	Q What's the function performed by the "show	14	witness' testimony.
15	PTP clock" command?	15	THE WITNESS: Yes, I think that that was
16	A It shows the state and status of the clock.	16	the intention.
17	And I don't recall the entire output from the command,	17	MR. WONG: Q. And is the same
18	but I think that's probably summarize majority of the	18	explanation does the same explanation apply to
19	output.	19	"show PTP parent" for the show aspect of that command?
20	Q Okay. And as we discussed earlier in today's	20	A Yes, for the show aspect of the command, yes.
21	deposition, the PTP IEEE specification defines the	21	Q Okay. What function does the "show PTP
22	term clock; correct?	22	parent" command perform?
23	A It defined the term clock, yes.	23	A It shows the status of the parent clock.
24	Q Okay. And the clock that is referred to in	24	Q When you say "the parent clock," are you
25	the command "show PTP clock" is the clock that is	25	referring to the parent clock as defined in the PTP
			Page 156
			raye 130
1		1	
1 2	defined in the PTP standard; correct?	1 2	standards?
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	Page 209		Page 211
1	even supported a GUI interface; correct?	1	documents while you were at Cisco that might have
2	MR. PAK: Same objections.	2	contained other alternatives that you considered for
3	THE WITNESS: I know the Catalyst switches	3	any of the PTP commands that we discussed today?
4	there are GUI interfaces that that exists even	4	A No, I wouldn't have.
5	before we developed the CE500 switches.	5	Q Okay. And, in preparing for this deposition,
6	MR. WONG: Okay.	6	did you see any other documents that showed any
7	Q And there was no proposal made to the parser	7	alternatives to any of the PTP commands that are
8	police to use a GUI interface for any of these	8	listed in Exhibit 96?
9	commands; correct?	9	A In preparation, I only saw these e-mails.
10	A My understanding of parser police was their	10	Q Okay.
11	responsibility is on the CLI commands.	11	A But again, I don't recall, during the time of
12	Q Was there a GUI police?	12	the few months of development, whether there was any
13	A I don't know.	13	written record of alternatives. It's on my mind,
14	Q Now, your counsel was asking you about a	14	it's not 100 percent sure there was written record.
15	series of hypothetical alternatives that could	15	Q Okay. In fact, you're not even sure how long
16	potentially have been used for these various commands.	16	it took for you to even come up with these commands as
17	Do you remember that line of questioning?	17	compared to the development; right?
18	A Yes.	18	A I don't remember that part
19	Q Where in Exhibit 96 do you propose the use of	19	Q Right.
20	a "PTP clock priority 2" command?	20	A of the detail.
21	A In this e-mail, it was the final version	21	Q That the part of coming up with these
22	after we considered multiple options. I think in the	22	commands is not as fresh in your memory; correct?
23	e-mail, it was the final version we wanted to propose	23	MR. PAK: Objection; mischaracterizes the
24	as the command.	24	witness' testimony.
25	Q Are you aware of other e-mails that exist	25	THE WITNESS: I would I'm pretty sure I
1		1	-
1	that list out the various options that you actually	1	
			came up with all of these commands.
2	considered for each of these commands?	2	MR. WONG: Okay.
3	A I don't remember there would be e-mails with	2 3	MR. WONG: Okay. THE WITNESS: I was the main developer
3 4	A I don't remember there would be e-mails with the parser police. We only consult them at at the	2 3 4	MR. WONG: Okay. THE WITNESS: I was the main developer MR. WONG: Okay.
3 4 5	A I don't remember there would be e-mails with the parser police. We only consult them at at the very last stage.	2 3 4 5	MR. WONG: Okay. THE WITNESS: I was the main developer MR. WONG: Okay. Q But you don't remember
3 4 5 6	A I don't remember there would be e-mails with the parser police. We only consult them at at the very last stage. Q Are there any e-mails in your recollection in	2 3 4 5 6	MR. WONG: Okay. THE WITNESS: I was the main developer MR. WONG: Okay. Q But you don't remember A of all of this.
3 4 5 6 7	A I don't remember there would be e-mails with the parser police. We only consult them at at the very last stage. Q Are there any e-mails in your recollection in general, not just with the parser police, but with	2 3 4 5 6 7	MR. WONG: Okay. THE WITNESS: I was the main developer MR. WONG: Okay. Q But you don't remember A of all of this. Q I'm sorry. Please finish your answer.
3 4 5 6 7 8	A I don't remember there would be e-mails with the parser police. We only consult them at at the very last stage. Q Are there any e-mails in your recollection in general, not just with the parser police, but with your colleagues on the team, that list out the various	2 3 4 5 6 7 8	MR. WONG: Okay. THE WITNESS: I was the main developer MR. WONG: Okay. Q But you don't remember A of all of this. Q I'm sorry. Please finish your answer. A Right.
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Page 213	Page 215
1 (WHEREUPON, the deposition ended at 3:36 p.m.) 3oOo 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	CERTIFICATE OF REPORTER I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause; That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision; That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto. I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto. Dated: 01/29/2016 **Signature** ANDREA M. IGNACIO, RPR, CRR, CCRR, CLR, CSR No. 9830
JURAT JURAT I, TONG LIU, do hereby certify under penalty of perjury, that I have read the foregoing transcript of my deposition in the matter of Cisco Systems, Inc., vs. Arista Networks, Inc., taken on January 15, 2016; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct. DATED this day of, SIGNATURE OF WITNESS NOTARIZATION (If Required) NOTARIZATION (If Required) State of Subscribed and sworn to (or affirmed) before me on this day of, proved to me on the basis of satisfactory evidence to be the person who appeared before me. Signature: (Seal)	